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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Broadcast Services, Advanced Television }
Systems Fourth Further Notice of Proposed } MM Docket No. 87-268; FCC 95-315
Rule Making and Third Notice of Inquiry }

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WASHINGTON COUNTY TELEVISION, INC. REPLY COMMENTS

I. Introduction

Washington County Television, Inc. (WCTV), owns and operates **Low Power Television Stations K66EK** in Bartlesville, OK. and **K60EX** in Nowata, OK.. Both stations, in concert with many other Low Power (LPTV) broadcasters, have vested interest in the above-referenced proceeding. WCTV submitted comments and has reviewed comments of other interested parties. WCTV's reply comments are contained herein.

II. Review of Other Contributors

The mind set of the varied special interest groups (WCTV is unaffiliated with any organized group but recognizes it will be seen as part of one or another such "group") is known to the FCC and requires no summarization here.

While encouraging to see the diversity of non broadcast contributors, we note most are unfamiliar with the current status of LPTV broadcasters. Some wish to promote the Honorable Mr. Gingrich's "Information Super Highway". Others wish to dress down all existing broadcasters without differentiating between those who serve their public with sound bites and those who serve with hours of local programming.

Without regard to the degree of broadcast knowledge, it is fair to summarize the majority DO NOT FAVOR GIVE AWAY OR AUCTION of spectrum. Few even promote the switch to High Definition TV (HDTV). The great majority seem to favor creation of more, independent, stations. A notable percentage specifically mention those words found throughout 47 CFR, "PUBLIC INTEREST".

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III. Review of Initial WCTV Comments

WCTV found the above-referenced proceeding to have placed significant but undue emphasis on recovery of spectrum. WCTV noted the proposal contained no plan at all for the protection or even preservation of LPTV. The dis-service to the public as well as potential loss of investment by LPTV operators was illuminated.

WCTV suggested the FCC use its good offices to orchestrate a plan to transition to HDTV (not simply digital TV) while allowing LPTV to "hold the fort" with NTSC during the transition period. WCTV suggested its approach "would help build the LPTV service. As full power stations transitioned, viewers with NTSC sets would still have LPTV. Advertisers and programmers would increase spending with local LPTV stations resulting in the funding necessary to make the transition when their turn comes."

Finely, WCTV pleaded with the Commission to "recognize the value of LPTV stations and their commitment to the future of free over-the-air television service to the public."

IV. New Comments in Reply

Public comments seem to overwhelmingly favor the "need for more diversity in TV land--not corporate monopolies". The complex technical issues dealt with in the above-referenced proceeding seem to be less important than the "need for new independent stations to counteract the growing concentration of media ownership".

WCTV respectfully suggests the public is calling for MORE LPTV, not less. There seems to be strong discontent with "the growing concentration of media ownership." Most LPTV operators are the "independent" stations repeatedly suggested by contributors. They are local entrepreneurs, providing local programming for local markets with local commercials, contributing to the local economy. Possibly, like WCTV, their own sense of professionalism has made them too indistinguishable from the much maligned "schlockmeisters who currently control the airwaves". LPTV must do a better job of touting their independence and existence.

WCTV respectfully requests the Commission to revisit the issue of LPTV during and after transition to ATV. The current proposal all but calls for the elimination of existing LPTV stations. LPTV stations not only outnumber full power stations but usually out perform them in many ways. Generally due to limited markets enjoyed by LPTV stations, and lack of mandatory cable carriage, advertising revenues are minimal. As pointed out in WCTV's original comments, a properly orchestrated transition to ATV could result in a growth cycle for LPTV's.

WCTV respectfully requests the Commission to carefully weigh the emphasis it has placed on promoting a switch to digital transmission. Without emphasis on HDTV, the forced elimination of NTSC appears to be detrimental to the public interest. The cost vs benefit of HDTV is even extremely dubious in the U.S. market. Existing NTSC technology renders excellent pictures when viewed at normal American living room distances. Admittedly, European and Asian living standards require smaller distances to the viewing screen and HDTV looks better.

Free over-the-air television is an industry in the United States as is Cellular, Personal Communications, Telephone, etc.. The blurring of divisions between each, currently separate, industry by promoting cross breeding at the Commission level seems unlikely to result in healthy offspring.

Respectfully submitted,

WASHINGTON COUNTY TELEVISION, INC.

By its President

A handwritten signature in black ink, appearing to read "M.D. Boughner", with a long, sweeping horizontal line extending to the right.

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